## BEFORE THE POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

RECEIVED

Dec 13 4 17 PM 'OI

POSTAL RATE DOGLESSION OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 2001

Docket No. R2001-1

MOTION FOR LATE ACCEPTANCE OF RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS MILLER TO INTERROGATORY OF THE AMERICAN BANKERS ASSOCIATION AND NATIONAL ASSOCIATION OF PRESORT MAILERS

(ABA&NAPM/USPS-T24—6)

The United States Postal Service respectfully requests that witness Miller's response to interrogatory ABA&NAPM/USPS-T24—6 be accepted three days out of time. The delay was occasioned by inadvertence. The Postal Service regrets the delay, but does not believe that any participant is prejudiced. The undersigned counsel will send the response via electronic mail to counsel for NAPM so as to further minimize any disruption.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr. Chief Counsel, Ratemaking

Anthony Alverno

Attorney

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2997; Fax -6187 December 13, 2001

## **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

Anthony Alverno

475 L'Enfant Plaza West, S.W. Washington, D.C. 20260-1137 (202) 268-2997; Fax -6187 December 13, 2001